

The Honorable Ricardo S. Martinez

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

BERNADETTE HIGHTOWER, LATERSHIA
JONES, GEORGE DEAN, and BRUCE MARK
WOODRUFF, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

RECEIVABLES PERFORMANCE
MANAGEMENT, LLC,

Defendant.

Case No. 2:22-cv-01683-RSM

**STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME FOR
DEFENDANT TO ANSWER AMENDED
CONSOLIDATED CLASS ACTION
COMPLAINT AND TO SUBMIT INITIAL
DISCLOSURES AND JOINT STATUS
REPORT AND CASE MANAGEMENT
PLAN**

**NOTE ON MOTION CALENDAR:
October 27, 2023**

I. STIPULATION

Pursuant to Local Rules 7(j) and 10(g), Plaintiffs Bernadette Hightower, Latershia Jones, George Dean, and Bruce Mark Woodruff, individually and on behalf of all others similar situated (“Plaintiffs”) and Defendant Receivables Performance Management, LLC (“Defendant”) hereby respectfully submit this stipulated motion for an extension of time for Defendant to answer, move or otherwise respond to Plaintiffs’ Consolidated Amended Class Action Complaint and for

1 an extension of time to submit Initial Disclosures and Joint Status Report and Discovery Plan, in
2 support thereof, state as follows:

3 1. Plaintiffs filed their Amended Consolidated Class Action Complaint on May 4,
4 2023. ECF No. 42.

5 2. Defendant's current due date for responding to Plaintiffs' Consolidated Class
6 Action Complaint is October 27, 2023. ECF No. 48.

7 3. Additionally, the Court has set the following deadlines for initial disclosures and
8 submission of the Joint Status Report and Discovery Plan: 1) Deadline for FRCP 26(f)
9 Conference: November 1, 2023; (2) Initial Disclosures Pursuant to FRCP 26(a)(1):
10 November 8, 2023; and (3) Combined Joint Status Report and Discovery Plan as required by
11 FRCP 26(f) and Local Civil Rule 26(f): November 15, 2023.

12 4. As set forth in the Parties' motion to amend complaint and for an extension of
13 time for Defendant to respond to the Amended Consolidated Class Action Complaint (ECF
14 No. 40), the Parties agreed to discuss the possibility of an early resolution, including the
15 exchange of information to allow the Parties to evaluate the strengths and weaknesses of
16 Plaintiff's claims and Defendant's defenses, as well as the scheduling of a mediation before
17 Hon. Wayne Andersen (Ret.). This mediation was conducted on July 12, 2023. ECF No. 45.

18 5. The Parties continue to discuss early resolution of this matter with the assistance
19 of a mediator. However, at this time, early resolution has not been successful.

20 6. Given that the Parties' efforts, up until now, have been focused on the potential
21 for resolution rather than litigation, the Parties stipulate and agree that good cause exists for
22 an extension as stipulated herein and that it would be beneficial to further extend the time for
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1 Defendant to answer, move, or otherwise respond to Plaintiffs' Consolidated Amended
2 Complaint.

3 7. As such, in light of the above and subject to Court approval, the Parties stipulate
4 and agree that Defendant shall have an extension of time up to and including November 27,
5 2023 to answer, move, or otherwise respond to Plaintiffs' Consolidated Amended Class
6 Action Complaint.

7 8. Moreover, the Parties stipulate and agree, subject to Court approval, that the
8 deadlines for initial disclosures and submission of the Joint status Report and Discovery Plan
9 be extended as follows: (1) Deadline for FRCP 26(f) Conference: December 1, 2023; (2)
10 Initial Disclosures Pursuant to FRCP 26(a)(1): December 8, 2023; and (3) Combined Joint
11 Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f):
12 December 15, 2023.

13
14 WHEREFORE, the Parties respectfully request that this stipulated motion be granted and that
15 Defendant be granted an extension as stipulated and agreed herein.

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17 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD on this 27th day of October,
18 2023.

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Attorneys for Defendant

ORDER

It is so ORDERED:

Defendant shall answer, move, or otherwise respond to Plaintiffs' Consolidated Amended Class Action Complaint on or before November 27, 2023.

The deadlines for initial disclosures and submission of the Joint Status Report and Discovery Plan per ECF No. 43 are extended as follows: (1) Deadline for FRCP 26(f) Conference: December 1, 2023; (2) Initial Disclosures Pursuant to FRCP 26(a)(1): December 8, 2023; and (3) Combined Joint Status Report and Discovery Plan as required by FRCP 26(f) and Local Civil Rule 26(f): December 15, 2023.

Dated this _____ day of October, 2023.

HONORABLE RICARDO S. MARTINEZ
UNITED STATES DISTRICT COURT JUDGE